

- 1- Do you agree that transitioning to reactive power priority will better support voltage regulation and help to reduce distribution upgrade costs associated with high penetrations of DERs, and if so, why? Parties should offer the pros and cons of adopting reactive power priority.**

Response:

Yes, we agree. Because the voltage rise happens when there is a large real power generation by the DER. In this condition, the available var capacity is not enough to mitigate the voltage rise. In fact, using var priority seems to be inevitable.

However, with var priority, customers located on different points on a feeder will not have an identical capacity of injecting their available real power due to the inherent voltage difference on the feeder. In our opinion there will need to be special measures that should be taken to have equal and fair conditions for DER owners with large voltage excursions.

- 2- Does the proposed tariff language adequately reflect the goal of the text change, i.e. to ensure reactive power priority, and if not, how can the text be modified?**

Response:

Yes, it is clear. Noting that the quote “shall be capable of operating dynamically within a power factor range of +/- 0.85 PF for larger (>15 kW) systems, down to 20% of rated power, and +/- 0.9 PF for smaller systems (≤15 kW), down to 20% of rated power” encourages the manufacturers to limit their available range of Power Factor (PF) to the mentioned one, even if it is possible for them to operate in a wider range. Because customers tend to have a PF as close to unity as possible.

If there are advantages for offering a wider range of PF, DERs from a technical standpoint could contribute more to voltage regulation. This would be helpful for the areas that a narrow range of PF is not effective enough for mitigating the voltage excursions. However, the DER owner may view these Grid Support Functions (GSF) to be identified as a possible ancillary service.

- 3- Is the proposed date optimal and achievable, and if not, what is the preferred date and why? Please be specific in your reasoning. For instance, you may indicate what tasks and lengths of time are necessary to comply.**

Response:

The date is acceptable.

- 4- If the change to reactive power should not be adopted, please give specific reasons why not. Parties may provide any research and/or evidence available to demonstrate from a technical standpoint that real power priority should be kept in favour over transitioning to reactive power priority.**

Response:

It is acceptable to make this change to reactive power so there is no reason not to.